

No. PD-0439-16

ROBERT RODRIGUEZ

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IN THE COURT OF
CRIMINAL APPEALS
OF TEXAS

FILED
COURT OF CRIMINAL APPEALS
11/29/2016
ABEL ACOSTA, CLERK

VS.

STATE OF TEXAS

MOTION TO EXTEND TIME TO FILE BRIEF

TO THE HONORABLE JUDGES OF SAID COURT:

Now comes ROBERT RODRIGUEZ, Appellant in the above styled and numbered cause, and moves for an extension of time to file his brief.

A motion for extension to November 28, 2016 was previously filed in this Court. With sincere regret, Appellant must now respectfully request an extension of time to November 30, 2016. Counsel has put significant time into the preparation of this brief, but still needs a short extension. To complicate an already stressful delay, unexpected computer/internet issues were encountered November 27 and 28, which were finally resolved mid-day of November 28. Counsel is cognizant of the importance of timely submissions, and recognizes the seriousness with which this Court treats missed filing deadlines. The Court may be assured that no one is more distressed about the continuing delay than counsel. Counsel continues to work furiously to get the brief completed and filed, and worked day

and night through the holidays, but despite her best efforts just simply could not meet the deadline, especially with the added technical difficulties. It is anticipated that the brief will be filed on November 29, but counsel requests an extension to November 30 in case of continued problems.

WHEREFORE, PREMISES CONSIDERED, appellant respectfully requests an extension until November 30, 2016 to file the brief in this cause.

Respectfully submitted,
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CERTIFICATE OF SERVICE

This is to certify that on November 29, 2016, a true and correct copy of the above and foregoing document was served on the District Attorney's Office, Guadalupe County, Texas, and on the State Prosecuting Attorney by efile/efile service.

/s/ Susan Schoon
Susan Schoon